

ETEXT ATTACHMENT

02/21/2002 16 : 61

February 20, 2002

Federal Election Commission
Reports Analysis Division
999 E Street, NW
Washington, DC 20463
Attn: Mr. Thomas F. Maxwell, III

Identification Number: --C00307405

Reference: Γ Amended 12 Day Pre-Special Report (1/1/01-4/25/01), received 7/18/01

Dear Mr. Maxwell:

This letter is in response to your request for additional information dated February 6, 2002 and received by the Keep Our Majority PAC on February 12, 2002.

␣Schedule B discloses a contribution to Dickey for Congress for retirement of debts incurred by the 2000 General election campaign. This contribution has been designated for the 2002 Primary and an amendment has been filed electronically.

␣Schedule B discloses a contribution designated for the Special Primary election in the state of Virginia. Although there was a Special General Election, the Republican Party also had a nominating convention/primary on 4/28/01. The contribution referenced in your letter was attributed to this nominating convention/primary. The report has been modified to indicate this and an amendment has been filed electronically.

␣Schedule B, Line 21(b) discloses payments to the National Republican Congressional Committee for travel. These charges were assessed by the National Republican Congressional Committee at the "usual and normal charge" for these services. The NRCC charges for travel at a "commercially reasonable rate prevailing at the time the service was rendered," and the charges are approved by NRCC accounting staff as well as the NRCC legal division. No in-kind contribution has occurred.

␣Schedule A of the report disclosed aggregate year-to-date totals for individuals that were incorrect due to a software problem. This has been corrected and an amendment has been filed electronically.

␣Schedule B supporting Line 28c disclosed a refund to Mylan Laboratories Inc. PAC which indicated that the original contribution was received in the year 2000. The original contribution was actually received by KOMPAC in 1999. This has been noted on the report and an amendment has been filed electronically.

␣The Committee is well aware of the regulations which require disclosure of the identification, mailing address, occupation and name of employer of every individual who contributes in excess of \$200 in a calendar year. All Committee solicitations include the appropriate disclaimers and requests for this information in a clear and conspicuous location. When a contribution is received and this information is incomplete, the Committee makes at least one follow-up request within 30 days of the receipt of the original contribution. An example of this letter is attached. This follow-up request includes a pre-addressed envelope for the contributor's convenience. The Committee includes any information received by contributors on the original report, or on an amendment, if necessary.

␣All transfers from the non-federal account for joint activity are made within the 70-day time period. Several of the transfers on this disclosure report occurred in January and February and were for expenditures made in the previous year. It is not necessary to transfer back anything to the non-federal account.

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¶The refund from Southern California Edison was inadvertently deposited into the federal account. This should have been deposited into the nonfederal account. A transfer to correct this has been made.

¶I have reviewed 11 CFR § 104.3(b)(3) regarding acceptable purposes of disbursements. There is no indication that "Accounting Fee/Expenses" is an unacceptable description. Furthermore, because this description is accurate, no amendment is required.

¶All disbursements reported on Schedule B, Line 21b disclose the full address of the vendor, except for memo entries for credit card payments. These memo entries include the vendor name, city, state and purpose of disbursement. Although Commission regulations do not specifically require committees to report ultimate vendor detail for disbursements for credit card payments, in the interest of full disclosure, KOMPAC does itemize, as memo entries, vendors who have been paid more than \$200 in a calendar year.

¶You indicate that this report discloses limited payments for administrative costs. This report details over \$115,000 for administrative costs. The Keep Our Majority PAC reports all administrative costs accurately and uses the funds expended method as is required. Furthermore, the Committee files a Schedule H1 with every FEC Form 3X.

¶Should you have any further questions, please feel free to contact me at 703-549-7705.

Sincerely,

Lisa R. Lisker
Assistant Treasurer

February 15, 2002

«PREFIX» «FNAME» «LNAME»

«Add1»

«Add_2»

«City», «ST» «ZIP»

Dear «PREFIX» «LNAME»:

¶On behalf of Keep Our Majority PAC, thank you for your generous contribution. However, Federal Election Law requires that we request the employer and occupation information for all contributors who give more than \$200 in a calendar year.

¶Please complete the information below and return it to our office by fax at (703)684-0683 or in the enclosed envelope to the following address:

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KOMPAC

PO Box 20209

Alexandria, VA 22320

UThank you for your support.

Sincerely,

Lisa R. Lisker

Assistant Treasurer

Federal Election Law requires committees to request the name, address, employer and occupation for all contributors whose contributions aggregate in excess of \$200 in a calendar year.

Name: _ «PREFIX» «FNAME» «LNAME»

Employer: _____ Occupation: _____